UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK ALBANY DIVISION

)	
)	
)	
)	
)	No. 1:17-cv-00668-MAD-DJS
)	
)	
)	
)	
)	
)	
)	

STIPULATION TO DISMISS AS TO EXPERT GLOBAL SOLUTIONS, INC. ONLY

WHEREAS on November 6, 2017, the Court granted the parties' Motion to Stay the instant matter pending the outcome of a related case that was filed with the American Arbitration Association entitled, *Shawn Perry v. Credit One Bank, N.A.*, Case No. 1-17-0000-3708 (Doc. No. 33).

WHEREAS on February 2, 2018, a decision was issued in the arbitration matter, granting Credit One's motion for summary disposition.

WHEREAS the arbitration decision was not appealed.

THEREFORE, Plaintiff, SHAWN PERRY, and Defendant, EXPERT GLOBAL SOLUTIONS, INC., through their respective counsel below, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), stipulate to dismiss this case against EXPERT GLOBAL SOLUTIONS, INC., without prejudice, both sides to bear their own fees and costs.

Respectfully submitted this 10th day of May 2018

HORMOZDI LAW FIRM, LLC

AGRUSS LAW FIRM, LLC

By: /s/ Shireen Hormozdi

Shireen Hormozdi 1770 Indian Trail Lilburn Road, Suite 175 Norcross, GA 30093 678-395-7795- office 866-929-2434- facsimile shireen@agrusslawfirm.com shireen@norcrosslawfirm.com Attorney for Plaintiff

By: /s/ James J. Parr James J. Parr, ARDC No. 6317921 4809 N. Ravenswood Avenue, Suite 419 Chicago, IL 60640 312-224-4695 – office 312-253-4451 – facsimile james@agrusslawfirm.com Attorney for Plaintiff Admitted Pro Hac Vice

SESSIONS, FISHMAN, NATHAN & ISRAEL, LLC

By: /s/ Aaron R. Easley

Aaron R. Easley (Bar No. 517286)

3 Cross Creek Drive Flemington, NJ 08822 Telephone: 908-237-1660

aeasley@sessions.legal

Attorney for Defendant, Expert Global Solutions, Inc.

IT IS SO ORDERED:

Mae A. D'Agostino U.S. District Judge

Dated: May 15, 2018 Albany, NY